

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE, TENNESSEE**

IN RE:	)	
	)	
PETITION OF LIMESTONE WATER	)	
UTILITY OPERATING COMPANY, LLC	)	DOCKET NO. 26-00070
TO ELECT AND OPT INTO AN ANNUAL	)	
RATE REVIEW MECHANISM AND ARRM	)	
TARIFF PURSUANT TO TENN. CODE	)	
ANN. § 65-5-103(D)(6)	)	

PETITION TO INTERVENE

The Consumer Advocate Division of the Office of the Tennessee Attorney General (“Consumer Advocate”), by and through counsel, pursuant to Tenn. Code Ann. § 65-4-118, respectfully petitions the Tennessee Public Utility Commission (“TPUC” or the “Commission”) to grant the Consumer Advocate’s intervention into this proceeding because consumers’ interests, rights, duties, or privileges may be determined or affected by the *Petition of Limestone Water Utility Operating Company, LLC to Elect and Opt into an Annual Rate Review Mechanism and ARRM Tariff Pursuant to Tenn. Code Ann. § 65-5-103(d)(6)* (“Petition”) filed in TPUC Docket No. 26-00070. For cause, Petitioner would show as follows:

1. The Consumer Advocate is authorized by Tenn. Code Ann. § 65-4-118 to represent the interests of Tennessee consumers of public utility services by initiating and intervening as a party in any matter or proceeding before the Commission in accordance with the Uniform Administrative Procedures Act (Tenn. Code Ann. §§ 4-5-101, *et seq.*) and TPUC rules.

2. Limestone Water Utility Operating Company, LLC (“Limestone” or the “Company”) is a public utility regulated by the Commission and provides water services to

approximately 610 water connections and wastewater services to approximately 2,082 sewer connections.¹

3. The Company's principal place of business is located at 655 Maryville Centre Drive, Suite 200, St. Louis Missouri, 63141.

4. Limestone's Petition requests to opt into an Annual Rate Review Mechanism ("ARRM").

5. Limestone conducted a Rate Case through TPUC Docket No. 24-00044 in which its rates were approved in two phases, with the second phase concluded by the Commission on June 2, 2026, though the official order setting rates has not yet been released.²

6. Limestone asserts that it meets the requirements for an ARRM as the rate case was conducted within the last five years.

7. Consumers' interests, including without limitation the proposed increase in rates to be paid by consumers under the Petition, may be affected by determinations and orders made by the Commission with respect to: (i) the interpretation, application, and/or implementation of Tenn. Code Ann. § 65-5-103(a), Tenn. Code Ann. § 65-5-103(d), and other relevant statutory and regulatory provisions; (ii) the review and analysis of the documentation, financial spreadsheets, and materials provided by Limestone; and (iii) the interpretation, application, and/or implementation of the terms and conditions of the Commission's Orders in TPUC Docket No. 24-00044.

¹ *Petition of Limestone Water Utility Operating Company, LLC to Elect and Opt into an Annual Rate Review Mechanism and ARRM Tariff Pursuant to Tenn. Code Ann. § 65-5-103(d)(6)*, p. 2, TPUC Docket No. 26-00070 (August 4, 2026).

² *Chairman David F. Jones's Motion Re: Limestone Water Utility Operating Company, LLC Rate Case Phase II*, p. 4, TPUC Docket No. 24-00044 (June 2, 2026).

8. Only by participating as a party to this proceeding can the Consumer Advocate adequately carry out its statutory duty to represent the interests of Tennessee consumers.

Accordingly, the Consumer Advocate respectfully requests the Commission to grant this Petition to Intervene.

RESPECTFULLY SUBMITTED,


JONATHAN SKRMETTI (BPR No. 031551)
Attorney General and Reporter
State of Tennessee



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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Petition to Intervene was served via U.S. Mail, with a courtesy copy by electronic mail provided upon:

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This the 11th day of August, 2026.



SHILINA B. BROWN
Senior Assistant Attorney General